

Mary Lou Terrien

From: Jennifer Reinhardt <reinhardt@mhpn.org>
Sent: Wednesday, February 24, 2016 10:38 AM
To: Mary Lou Terrien
Subject: Remarks against HB 5232

Dear Ms. Terrien,

I would like to register my opposition to HB 5232.

The National Historic Preservation Act (NHPA) was established 50 years ago in response to community renewal, where decisions thought to be in the best interest of the community turned out not to be the case (demolition of historic neighborhoods to create highways or new housing developments, etc.) NHPA establishes that historic preservation is in the public interest, that federal agencies must address historic preservation, and the **Michigan Local Historic Districts Act (PA 169) establishes the means of extending that protection at a local level through the creation of local historic districts.** There are 78 communities in Michigan with local historic districts, protecting 20,000 structures determined by the community to be historically significant. Detroit alone has 127 local historic districts that have been proven as centers of resilience critical to the rebuilding of the City's community and civic structures.

My concern stems from the substantial changes contained in HB 5232 that would alter the way in which local historic districts are established and administered. The most dramatic change will be from a local government and Certified Local Government (CLG) based zoning program to property owner based designation. Currently, local historic districts are established by locally appointed constituents in consultation with city government and ratified by elected city councils. Stipulating that 2/3 of property owners in a proposed local historic district approve designation ignores the potential for a single or few real estate interests to own a majority of properties in a historic area and impose their will. Current processes allow local governments to review each situation individually, assessing them against the Secretary of Interior's Standards, within the local historical context. The proposed change would remove the criteria of National, State, or Local significance as a driver for being considered and ratified by elected officials as 2/3 of property owners would decide what preservation standards will be used in the local historic district. **This would likely conflict with parts of the NHPA.**

Also significant is the stipulation that property owners within a local historic district who object to a review decision during the permitting process would appeal not to an independent third party (the state historic review board) but to the local legislative body, which may have no experience, training or interest in supporting historic preservation and would open up the process to unnecessary political and development pressures. **This potential conflict of interest would also likely conflict with requirements of CLG status, impacting the ability of CLG communities to receive state grant funds (almost \$1.5 million since 2003) and jeopardizing how federal rehabilitation tax credit projects could be successfully completed across the state.**

The proposed legislation would create a default position that obstructs rather than promotes historic preservation, placing significant burdens on identifying and protecting irreplaceable historic resources, and creating additional administrative hurdles and exorbitant costs on local governments. Our historic buildings, neighborhoods, and communities are too important.

Sincerely,
Jennifer Reinhardt

Jennifer Reinhardt
Detroit Preservation Specialist
Michigan Historic Preservation Network | National Trust for Historic Preservation
313.742.5757 (cell)

Be sure to watch MHPN's new video: [Vacant Not Blighted: Revitalizing Detroit](#)